

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

DAVID CAIN AND LINDA CAIN,

Plaintiffs,

v.

THE UNITED STATES,

Defendant.

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Case No. 23-580 T

MOTION TO FILE UNDER SEAL

Pursuant to RCFC 5.2 and 9(m), Plaintiffs, David Cain and Linda Cain, by counsel, respectfully move this Court for the entry of an Order granting Plaintiffs leave to file under seal an unredacted copy of the Complaint and all accompanying exhibits.

The Complaint and accompanying exhibits contain personally identifiable information of Plaintiffs, including Plaintiffs' Social Security Numbers, and other information that may be considered confidential or sensitive personal information that should be protected from disclosure. Filing such information in unredacted form would expose Plaintiffs to unnecessary risks and dangers, including identity theft.

Therefore, Plaintiffs respectfully request that unredacted copies of the Complaint and all accompanying exhibits be filed under seal.

Dated: April 24, 2023

Respectfully submitted,

VENABLE LLP

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